

## State Water Resources Control Board

August 29, 2016

IRG Circle Triangle, LLC  
Attention: Mr. Dwight Stenseth  
7921 Southpark Plaza, Suite 109  
Littleton, Colorado 80120  
[Via email only] ([dstenseth@resight-ai.com](mailto:dstenseth@resight-ai.com))

Dear Mr. Stenseth:

CLOSURE DENIAL REVIEW FOR PETROLEUM UNDERGROUND STORAGE TANK CASE,  
BIXBY LAND COMPANY, 4401-4409 LOS COYOTES DIAGONAL, LONG BEACH,  
LOS ANGELES COUNTY

State Water Resources Control Board (State Water Board) Resolution No. 2012-0062 requires that State Water Board staff review a lead agency's decision when the lead agency has denied a request by a responsible party for an underground storage tank (UST) case closure pursuant to the Low-Threat UST Case Closure Policy (Policy).

The subject case has the following identification numbers:

- State Water Board, GeoTracker No. T0603774459
- Los Angeles Regional Water Quality Control Board (Los Angeles Water Board), Case No. 908150307

State Water Board staff reviewed the closure request dated April 29, 2016, and the response from the Los Angeles Water Board dated July 8, 2016. After careful consideration of the GeoTracker record, State Water Board staff agrees with the Los Angeles Water Board staff determination that all of the Policy criteria have not been met. Based on information in the above-referenced GeoTracker record, State Water Board staff finds that the subject case does not meet the following Policy criteria:

- **General Criterion d.** – Free product has been removed to the maximum extent practicable.
- **General Criterion e.** – A conceptual site model that assesses the nature, extent, and mobility of the release has been developed.
- **General Criterion f.** – Secondary source has been removed to the extent practicable.
- **Groundwater Media-Specific Criteria**

Groundwater monitoring results from the last year indicate free product thickness ranging from 0.06 to 1.45 feet in monitoring well MW-2. Concentrations of petroleum constituents in groundwater samples obtained from monitoring wells MW-1 and MW-3 are indicative of free product.

The conceptual site model is not complete. The groundwater assessment is incomplete because the areal extent of contamination is not defined. There is inadequate evidence to implicate an off-site source, and forensic analysis of free product supports an older fueling facility release consistent with the timeline of the release at the subject site. A single product bailing event has been conducted at monitoring well MW-2. Otherwise, remediation has not been attempted.

Free product is present on-site, and Groundwater Media-Specific Criteria for Class 3 are not met. The contaminant plume is of unknown length. Free product has not been removed to the maximum extent practicable and may extend off-site. There are only two and a half years of groundwater monitoring data; therefore, the plume has not been demonstrated to be stable or decreasing for a minimum of five years to meet Policy groundwater criteria.

Contaminants remaining at the subject site continue to pose a potential threat to human health, safety, and the environment. Criteria for low-threat UST case closure have not been met at this time, therefore closure of the UST case is not appropriate.

If you have any questions, please contact George Lockwood at (916) 341-5752 or [George.Lockwood@waterboards.ca.gov](mailto:George.Lockwood@waterboards.ca.gov).

Sincerely,



Karen Larsen, Deputy Director  
Division of Water Quality

cc: [Via email only]

Mr. Samuel Unger, Executive Officer  
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